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February 15, 2023

Filed via ECF

The Honorable Nicholas G. Garaufis
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Douglass Mackey, Criminal Docket No. 21-0080 (NGG)

Dear Judge Garaufis:

Pursuant to the Court's order of January 23, 2023, I write on behalf of Douglass Mackey to provide notice that Associate Professor George Hawley of the University of Alabama's Department of Political Science is a potential defense witness at trial. Professor Hawley is an expert in online media strategies of political conservatives. Professor Hawley is expected to testify in substance that such strategies have included use of social media, for example, to provoke ideological opponents, exploit natural fissures in opposition coalitions, and create apparent controversies to generate coverage by mainstream journalists. Professor Hawley has written and spoken extensively about areas of his expertise including the expected subject matter of his testimony in books published by Columbia University Press and Oxford University Press and in publications such as The New York Times, the Washington Post, the American Review of Politics, and the Brookings Institute. *See, e.g.*, "George Hawley: Is the Alt-Right Collapsing," presented to the Center for Right-Wing Studies at the University of California, Berkeley, 2018.¹ Professor Hawley's *curriculum vitae* is attached hereto and is available at his website, <http://www.georgehawley.com>.

Respectfully submitted,

/s/ Andrew J. Frisch
Andrew J. Frisch

Enclosure

cc: AUSA Erik Paulsen
AUSA Turner Buford
AUSA William Gullotta

¹ Available at <https://www.youtube.com/watch?v=McqA5wmI5fQ>.